STATE OF ILLINOIS SECRETARY OF STATE SECURITIES DEPARTMENT

IN THE MATTER OF: SCOTT MIKROS, MIKROS ECONOMICS HEDGE FUND, LLC, and RISK MANAGEMENT INTERNATIONAL, LLC

FILE NO. 0400639

ORDER OF PROHIBITION

TO THE RESPONDENT: Scott Mikros

10057 South Bell Avenue Chicago, Illinois 60643

Mikros Economics Hedge Fund, LLC C/o Risk Management International, LLC 10057 South Bell Avenue Chicago, Illinois 60643

Risk Management International, LLC 10057 South Bell Avenue Chicago, IL 60643

WHEREAS, a Temporary Order of Prohibition was issued by the Secretary of State on November 3rd, 2004 which prohibited Respondents Scott Mikros and Risk Management International, LLC from acting as an investor advisor or as an investor advisor representative, and prohibited Respondents Scott Mikros, Risk Management International, LLC and Mikros Economics Hedge Fund from offering or selling securities in or from this State until further Order of the Secretary of State or his duly authorized representative;

WHEREAS, pursuant to Section 11.F of the Illinois Securities Law of 1953 [815 ILCS 5] (the "Act"), the failure to request a hearing within thirty (30) calendar days of the entry of the Temporary Order shall constitute an admission of any facts alleged therein and constitute a sufficient basis to make the Temporary Order final;

WHEREAS, all Respondents have failed to request a hearing on the matters contained in the Temporary Order within thirty (30) calendar days of the entry of said Temporary Order and the Respondents are hereby deemed to have admitted the facts alleged in the said Temporary Order;

WHEREAS, the Secretary of State, by and through his duly authorized representative, has adopted the Findings of Fact contained in the said Temporary Order as the Secretary of State's Findings of Fact as follows:

- 1. Respondent Scott Mikros is a resident of Illinois and holds himself out as the sole principal of Respondent Risk Management International, LLC, an Illinois Limited Liability Company.
- 2. Respondent Risk Management International, LLC is the managing member of Respondent Mikros Economics Hedge Fund, LLC, an Illinois Limited Liability Company.
- 3. Scott Mikros, Risk Management International, LLC, and Mikros Economics Hedge Fund, LLC are herein collectively referred to as "Respondents".
- 4. Mikros Economics Hedge Fund, LLC is purported to be engaged in investing, trading, buying, selling, and otherwise acquiring, disposing of, and dealing in securities such as stocks, bonds, and options. The Company's stated primary objective is to preserve equity while profiting from covered call option positions.
- 5. Respondents by and through Scott Mikros offered for sale interests in the Mikros Economics Hedge Fund, LLC to at least one Illinois Resident.
- 6. The activities described in paragraphs 4-5 above constitutes the offer and sale of a security and as those terms are defined in Sections 2.1, 2.5, and 2.5a of the Illinois Securities Law of 1953 [815 ILCS 5] (the "Act").
- 7. The Private Placement Memorandum of the Mikros Economics Hedge Fund, LLC provides that Scott Mikros by and through Risk Management International, LLC has the sole authority and discretion to manage the affairs of the Mikros Economics Hedge Fund, LLC and determine the investment strategies to be employed.
- 8. The Private Placement Memorandum described in paragraph 7 above further provides that Risk Management International would receive a fee for the investment advisory services provided the Mikros Economics Hedge Fund, LLC.
- 9. The activities in paragraphs 7 and 8 above constitute the activities of an investment advisor and an investor advisor representative.

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- 10. Pursuant to the authority granted in Sections 11.C and 11.D of the Act and for the protection of the investing public a letter requiring a notarized affidavit completely responding to the information so requested therein was sent to the Scott Mikros, Manager, Mikros Economic Hedge Fund, LLC, C/O Risk Management International, LLC 10057 South Bell Avenue, Chicago, Illinois 60643.
- 11. The letter referenced in paragraph 10 above was deposited in the United States mail, (certified mail, return receipt requested) on July 7, 2004. Respondent, Scott Mikros signed receipt for the letter on July 8, 2004.
- 12. Respondent was required to respond within ten days (July 18, 2004) of receipt of the letter referenced in paragraph 9 above.
- 13. Respondent failed and refused to respond by July 18, 2004 and has not responded as of the date of this Order.
- 14. Section 12.D of the Act provides, <u>inter alia</u>, that it shall be a violation for any person to fail to file with the Secretary of State any application, report or document required to be filed under the provisions of the Act or any rule or regulation made by the Secretary of State pursuant to the Act.
- 15. By virtue of the foregoing, Respondents have violated Section 12.D of the Act.

NOW THEREFORE IT IS HEREBY ORDERED: That pursuant to Section 11.F of the Act, Respondents Scott Mikros and Risk Management International, LLC are <u>PROHIBITED</u> from acting as an investor advisor or as an investor advisor representative in or from the State of Illinois; and Respondents Scott Mikros, Risk Management International, LLC and Mikros Economics Hedge Fund are <u>PROHIBITED</u> from offering or selling securities in or from the State of Illinois.

Dated: This 2 day of March 2007.

JESSE WHITE
Secretary of State
State of Illinois